

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

ARISE FOR SOCIAL JUSTICE; )  
{OISTE?; NEW ENGLAND STATE-AREA )  
CONFERENCE OF THE NAACP; )  
REV. TALBERT W. SWAN, II; )  
NORMAN W. OLIVER; DARLENE )  
ANDERSON; GUMERSINDO GOMEZ; )  
FRANK BUNTIN; RAFAEL RODRIQUEZ; )  
and DIANA NURSE ) Civil Action No. 05-30080-MAP  
 )  
Plaintiffs, )  
 )  
v. )  
 )  
 )  
CITY OF SPRINGFIELD and SPRINGFIELD )  
ELECTION COMMISSION )  
 )  
Defendants. )  
 )

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**DEFENDANTS' LIST OF EXHIBITS**

**ELECTION COMMISSION**

1. Election Warden Handbook (undated)
2. Official elections returns (whole or in part; primary and/or general election) from the Springfield Office of the Election Commission for the following elections: a) 1959; b) 1963; c) 1977; d) 1981; e) 1987; f) 1989; g) 1991; h) 1993; i) 1995; j) 1997; k) 1999; l) 2000; m) 2001; n) 2002; o) 2003; p) 2004; q) 2005; r) 2006

**PERSONNEL DEPARTMENT**

3. Affirmative Action Plan for Employment

**PLANNING DEPARTMENT**

4. Springfield and its Neighborhoods: Statistical Profilc dated March 2003
5. Springfield and its Neighborhoods: Statistical Profile dated March 1993

**OFFICE OF HOUSING AND NEIGHBORHOOD SERVICES**

6. Listing of Neighborhood Councils/Organizations (dated 06/10/2005)
7. HOME Allocations Citywide - 7/96 through present (dated 02/14/05)
8. Consolidated Annual Performance & Evaluation Report -- Fiscal Year 2004-2005
9. City of Springfield's Action Plan -- Fiscal Year 2006-2007
10. Homebuyer Workshop Outline (undated)
11. U.S. Department of Housing and Urban Development -- HOME Investment Partnerships Program (HOME) Dashboard Report: received by Mayor Ryan on September 29, 2006
12. Homebuyer Assistance Program -- revised 06/2006
13. HAP, Inc., Programs and Services: accessed from [www.haphousing.org/programs/](http://www.haphousing.org/programs/) on 11/10/2006
14. Commonwealth of Massachusetts HOME American Dream Downpayment Initiative (ADDI) Buyer Assistance Application and Program Guidelines (updated June 2006)
15. Various webpages from the City of Springfield's website

**DEPARTMENT OF HEALTH AND HUMAN SERVICES**

16. Health Update: Pregnancies and Births 1993 - 2005
17. Health Update: Pregnancies and Births 1993 - 2000
18. Health Update: Births to Teens 1993 - 2000
19. Health Update: Births to Teens 1991 - 1998
20. Health Update: Neighborhood Perinatal Indicators 1989 - 1999
21. Health Update: Substance Abuse Treatment among Springfield Residents (2nd edition/October 1999)
22. Health Update: Substance Abuse Treatment among Springfield Residents (3rd edition/October 2000)



23. Health Update: A Profile of the AIDS Epidemic in the City of Springfield, MA (2nd edition, 1999)
24. Health Update: The HIV/AIDS Epidemic in the City of Springfield (3rd edition, 2002)
25. Finding Solutions to Springfield's Oral Health Crisis (undated)
26. Report from the Springfield Mayor's Crusade against Cancer Community Forum (October 2003)
27. Department of Health and Human Services organizational chart (re. 09/22/2004)
28. Department of Health and Human Services Reorganization Plan (undated)
29. Contract by and between City of Springfield's Department of Public Health and the Criminal Justice Organization of Hampden County, Inc. for a Health Care Access Coordinator, effective July 1, 2004.
30. Department of Health and Human Services Permit Fees Schedule (undated)
31. EEO Report for The Department of Health and Human Services, for the period of 04/04/2004 thru 06/30/2004
32. City Wide Violence Prevention Task Force Report (date uncertain)
33. Department of Health and Human Services Job Descriptions (undated)
34. Department of Health and Human Services budget for September 2004; and nine month budget for fiscal year 2005

## POLICE DEPARTMENT

35. A Management Study of the Springfield Police Department: Executive Summary Conducted by Carroll Buracker & associates, Inc., dated May 4, 2005
36. Inter-Departmental Correspondence 01/14/1992 and 12/21/2004
37. Traffic Stop analysis 08/01/2005 thru 10/23/2006
38. Crime Analysis 2005 (dated 10/21/2006)
39. Internal Investigations Unit Statistical Information 01/01/2005 thru 12/31/2005
40. Inter-Departmental Correspondence dated from 05/05/2006 thru 11/07/2006

41. General Orders: G.O. 100 thru G.O. 700 and Protocol B: Responding to Biological Hazardous Materials
42. Springfield Police Department Procedures for Investigation and Disposition of Citizen Complaints, including locations designated to receive complaints in the City of Springfield, fax from Springfield Police Chief, November 20, 1998
43. The American Community Survey: Updated Information for America's Communities. U.S. Census Bureau 11/2001
44. Community Policing: The Good Neighbor Handbook . Accessed from the Springfield Police Department's web site on January 11, 2007.

## **SPRINGFIELD PUBLIC SCHOOLS**

45. School Committee minutes for October 12, 2000; February 21, 2002; March 21, 2002; September 19, 2002; November 21, 2002; April 3, 2003; and June 26, 2003
46. June 21, 2005, memo from School Superintendent Dr. Joseph P. Burke regarding school improvement expenditures
47. Springfield Public Schools' webpage; accessed from [www.sps.springfield.ma.us](http://www.sps.springfield.ma.us) on 12/18/2006
48. Springfield Public Schools -- Mission and Goals for 2005-2008
49. Springfield Public Schools -- Culture of Achievement (undated)
50. Springfield Public Schools -- Student and parent handbook 2006-2007 school year
51. Springfield Public Schools -- Pupil Progression Plan (undated)
52. Springfield Public Schools -- District Curriculum Accommodation Plan (undated)
53. Springfield Public Schools -- 2005-2006 NCLB District Report Card: accessed from [www.sps.springfield.ma.us](http://www.sps.springfield.ma.us) on 12/18/2006
54. Springfield Public Schools -- MCAS Results Over Time 2000-2004: Authored by Dr. Joseph P. Burke, Superintendent, September 22, 2004
55. Step Up Springfield goals, dated 09/22/2004

**CITY CLERK**

56. Copy of City of Springfield Manual, dated 1959, containing Rules and Orders of the City Council, "together with a list of City officers, committees, boards, commissions, and other information concerning the City of Springfield"
57. Rules and Orders of the City Council, dated January 2, 1962 and signed by the City Clerk
58. Massachusetts General Laws, Chapter 44, Section 32. Submission to the City Council. Procedure for Approval, Rejection or Alteration
59. Revised Ordinance of the City of Springfield 1956, the Charter of the City and the General Ordinances of the City, enacted as a whole February 4, 1957, effective March 1, 1957
60. Massachusetts Acts, 1936, Chapter 140, "An Act Relative to the Time for Filing Nomination Papers for Candidates to be Voted for at City and Town Primaries"
61. Massachusetts Acts of 1901, Chapter 147, "An Act to Amend the Charter of the City of Springfield Relative to the Election of Aldermen and Councilmen"
62. Massachusetts Acts of 1884, Chapter 303, "An Act to Amend the Charter of the City of Springfield in Relation to the Election of Alderman"
63. Massachusetts Acts of 1877, Chapter 146, "An Act to Revise and Amend the Charter of the City of Springfield"
64. Massachusetts Acts of 1852, Chapter 94, "Inhabitants of Springfield made a body corporate as the City of Springfield"

**OTHER CITY DEPARTMENTS**

65. Law Department inter office memo dated February 27, 1998; listing civil rights cases against the City
66. June 16, 2005, letter from Patrick J. Sullivan, Director of Parks, Buildings and Recreation Management regarding document search
67. June 15, 2005, facsimile transmission from the Department of Public Works regarding monies spent on road and sidewalks from 1996 thru the present

**NEWSPAPER ARTICLES**

68. "Event recognizes black politicians" Azell Cavaan  
The Republican 02/25/2005
69. "Taxes, health top councilor's agenda" Peter Goonan  
Union-News 01/24/2000
70. "Councilor wants colleges to pay – In lieu of tax plan pitched" Peter Goonan  
Union-News 12/04/2000
71. "Mayor says no to taxing nonprofits" Beatrice O'Quinn Dewberry  
Union-News 12/07/2000
72. "Tax rate decision follows weekend hearing" Peter Goonan  
Sunday Republican 12/10/2000
73. "Tax plan would hurt nonprofits that aid city" Staff  
Union-News 12/11/2000
74. "In-lieu-of-tax appeal opposed by mayor" Beatrice O'Quinn Dewberry  
Union-News 12/15/2000
75. "Tax idea for nonprofits rejected" Peter Goonan  
Union-News 12/19/2000
76. "Our candidate choices in Springfield elections" Staff  
Union-News 10/31/2001
77. "Bickering councilors to meet" Mary O'Shea  
Union-News 10/26/1996
78. "Drive aims to up Latino voting" Natalia Munoz  
The Republican 03/27/2006
79. "Computer policy adopted" Mary O'Shea  
Union-News 05/06/1997
80. "School board Oks computers for 2 members" Mary O'Shea  
Union-News 05/24/1997
81. "Albano orders search for waste in school budget" Carol Malley  
Union-News 06/04/1997

82. "3 councilors attack higher school bond – Call for commission revamp"  
Carol Malley  
Union-News 07/23/1997
83. "Officials uphold computer policy" Mary O'Shea  
Union-News 02/02/1998
84. "Raise bid revives computer issue" Mary O'Shea  
Union-News 04/18/1998
85. "Councilor criticized for remarks – McCollum, Ryan at odds over pay raise, computer" Mary O'Shea  
Union-News 04/23/1998
86. "At \$500 a head, McCollum fans turn out" Mary O'Shea  
Union-News 10/27/1999
87. "School Committee expecting little upheaval despite vote" Mary O'Shea  
Union-News 11/04/1999
88. From the Connecticut Valley Historical Museum and newspaper research at the Springfield Public Library, various 1959 newspaper articles and "advertisements" from the Springfield daily newspapers concerning the "Plan A" government referendum
89. "Ideas for Springfield," Vol. I, No. 3, prepared by Robert Shanley, Joint Civic Agencies, Future Springfield, Inc., distributed by the Springfield City Library

## **DEPOSITION TRANSCRIPTS**

90. Deposition Testimony of Jose Tosado, October 18, 2005, in Arise for Social Justice v. City of Springfield, C.A. No. 05-30080-MAP
91. Deposition Testimony of Bud L. Williams, October 19, 2005, in Arise for Social Justice v. City of Springfield, C.A. No. 05-30080-MAP

## **STATISTICAL DATA**

92. Massachusetts Election Statistics, The Elections Division, Office of the Massachusetts Secretary of State, regarding certain legislative district contests and registered voters and turn-out, for the following years: 1980, 1982, 1984, 1986, 1988, 1990, 1992, 1994, 1996, 1998, and 2000

93. Urban Voters Go to the Polls: Comparing Voter Turnout in Massachusetts Cities: 2000 to 2004. Prepared by MassVOTE
94. Voting Behavior in Springfield, a Statistical and Analytical Report, September 1973, Springfield Urban League
95. Voting Behavior in Springfield, a Statistical and Analytical Report, Second Edition, 1973-1982; Springfield Urban League

**UNITED STATES OF AMERICA v. CITY OF SPRINGFIELD  
C.A. No. 06-30123-MAP**

96. Agreed Settlement Order, September 15, 2006
97. Selected excerpts of Transcript of TRO Hearing Held Before the Honorable Michael A. Ponsor, United States District Court Judge, August 28, 2006
98. Opposition to Plaintiffs' Request for a Temporary Restraining Order or in the Alternative, for Preliminary Injunction, and Cross Motion for Preliminary Injunction and Order to Exclude, or in the Alternative Defer, Introduction of Declarations or Testimony, including Exhibits
99. Spanish Surname Analysis of Registration provided by Department of Justice, Civil Rights Division, Voting Section for 2004 and 2005
100. Letter dated September 28, 2006 from John "Bert" Russ of the U.S. Department of Justice, Civil Rights Division to City Solicitor Pikula regarding Spanish surname analysis of the July 2006 voter registration list.
101. Letter dated 01/05/2007 to City Solicitor Pikula from John "Bert" Russ of the U.S. Department of Justice Civil Rights Division regarding the City's significant progress in resolving the issues that were brought forward in the initial complaint.
102. Notice of the Filing of Federal Observer Reports for the September 2006 Election
103. Notice of the Filing of Federal Observer Reports for the November 2006 Election
104. Copies of notices published in Spanish-speaking media
105. Copies of signs drafted by staff of the Springfield Election Commission and posted in polling places
106. Index and copies of selected documents, forms, and information provided on <http://www.springfieldcityhall.com/COS/elections/> by the Springfield Election Commission

107. Index and copies of documents, forms, and information provided on <http://www.sec.state.ma.us/ele/eleidx.htm> by the Elections Division, Office of the Secretary of the Commonwealth
108. List of poll workers by polling place for the 2006 primary and general election, Office of the Election Commission, prepared by Ms. Gladys Oyolo, Spanish Language Election Program Coordinator
109. Notice of Meeting for the Spanish Language Advisory Committee

**STEPHAN THERNSTROM, Ph.D., EXPERT WITNESS**

110. Expert Witness Report in Arise for Social Justice v. Springfield, of Dr. Stephan Thernstrom, May 24, 2006
111. Rejoinder to Rebuttal Reports of Douglas Amy and Richard Engstrom for Arise for Social Justice v. Springfield, October 30, 2006;
112. Curriculum vitae of Dr. Stephan Thernstrom
113. Deposition of Dr. Thernstrom taken on Wednesday, August 2, 2006
114. Bullock , Charles S. III and Richard E. Dunn, "The Demise of Racial Districting and the Future of Black Representation," 48 Emory Law Journal (Fall, 1999).
115. Data from United States Census Bureau's American FactFinder, <http://factfinder.census.gov/home/staff/main.html>.
116. Highton, Benjamin and Arthur L. Burris, "New Perspectives on Latino Voter Turnout Rates in the United States," American Politics Research, Vol. 30, No. 3 (May, 2002)
117. Brace, Kimball, Lisa Handley, Richard G. Niemi, and Harold W. Stanley, "Minority Turnout and the Creation of Majority-Minority Districts," 23 American Politics Quarterly (April, 1995)
118. Haijnal, Zoltan L. and Paul G. Lewis, "Municipal Institutions and Voter Turnout in Local Elections," 38 Urban Affairs Review (2003)
119. Halligan, Alice L., "A Community's Total War Against Prejudice," 16 Journal of Educational Sociology (February, 1943).

120. "US Census Points to More Minorities," The Republican, Stan Freeman (May 10, 2006)
121. "Event Recognizes Black Politicians," The Rcpulican, Azell Murphy Cavaan (February 25, 2005)
122. "Taxes, Health Top Councilor's Agenda," Union-News, Peter Goonan (January 24, 2000)
123. "Computer Policy Adopted," Union-News, Mary Ellen O'Shea (May 6, 1997)
124. "At \$500 a head, McCollum Fans Turn Out," Union-News, Mary Ellen O'Shea (October 27, 1999)
125. "Drive Aims to Up Latino Voting," Union-News, Natalia Munoz (March 26, 2006)
126. "Hatred Still Haunts Many Lives, Minorities Face Bias Every Day," [reporter], Sunday Republican (October 16, 1994)
127. "Political Talent Emerges in the Suburbs," Gromers Jeffrey, Jr. Dallas Morning News, June 29, 2005

**JOHN E. HARMON, Ph.D., EXPERT WITNESS**

128. Expert Report of Professor John Harmon (March 9, 2006);
129. Curriculum vitae of John E. Harmon, Ph.D.;
130. Exhibit A from the Expert Report of Professor John Harmon (March 9, 2006);
- 131 Exhibit B from the Expert Report of Professor John Harmon (March 9, 2006);
132. Excerpts from deposition transcript of John E. Harmon, PhD (April 7, 2006)
133. Exhibit number 2 from the deposition of John E. Harmon, PhD (April 7, 2006)
134. Exhibit number 3 the deposition of John E. Harmon, PhD (April 7, 2006)
135. Exhibit number 4 from the deposition of John E. Harmon, PhD (April 7, 2006)

**DOUGLAS J. AMY, Ph.D., EXPERT WITNESS**

136. Excerpts from deposition transcript of Douglas James Amy (April 21, 2006), including excerpts from documents (exhibits) used during deposition obtained from Dr. Amy's website: <http://www.mtholyoke.edu/acad/polit/damy>
137. Deposition transcript of Douglas James Amy (April 21, 2006), Exhibit 1 -- Notice of Deposition
138. Deposition transcript of Douglas James Amy (April 21, 2006), Exhibit 2 -- Curriculum Vitae of Douglas J. Amy
139. Deposition transcript of Douglas James Amy (April 21, 2006), Exhibit 3 -- Amy, Douglas J., "What is Proportional Representation and Why do We Need This Reform?"
140. Deposition transcript of Douglas James Amy (April 21, 2006), Exhibit 4 -- Amy, Douglas J., "A Brief History of Proportional Representation in the United States"
141. Deposition transcript of Douglas James Amy (April 21, 2006), Exhibit 5 -- Amy, Douglas J., "How Proportional Representation Would Finally Solve Our Redistricting and Gerrymandering Problems"
142. Deposition transcript of Douglas James Amy (April 21, 2006), Exhibit 6 -- Amy, Douglas J., "Fair Representation for Racial Minorities: Is Proportional Representation the Answer?"
143. Deposition transcript of Douglas James Amy (April 21, 2006), Exhibit 7 -- Amy, Douglas J, Robert Richie and Frederick McBride, "How Proportional Representation Can Empower Minorities and the Poor"
144. Deposition transcript of Douglas James Amy (April 21, 2006), Exhibit 8 -- Hill, Steven, "A Voting Rights Act at War With Itself"
145. Deposition transcript of Douglas James Amy (April 21, 2006), Exhibit 9 -- Amy, Douglas J., "What are Voting Systems and Why are They Important?"
146. Deposition transcript of Douglas James Amy (April 21, 2006), Exhibit 10 -- Expert Report of Professor John Harmon
147. Expert Report of Douglas J. Amy, Ph.D., (March 9, 2006)
148. Rebuttal report of Douglas J. Amy, Ph.D. (September 14, 2006)

**RICHARD L. ENGSTROM, Ph.D., EXPERT WITNESS**

149. Expert Report of Richard L. Engstrom, Ph.D.(March 8, 2006)
150. Rebuttal Report of Richard L. Engstrom, Ph.D.(September 14, 2006)
151. Deposition transcript of Richard L. Engstrom, Ph.D. (April 19, 2006)
152. Curriculum vitae of Richard L. Engstrom, Ph.D.

**HUMAN RELATIONS COMMISSION 1962 - 1973**

153. Human Relations Commission Report prepared by the Intergroup Relations Office (undated)
154. An Ordinance Human Relations Commission (undated)
155. Report of the HRC Task Force on Purposes and the Community Education Committee (undated)
156. Report-Springfield Human Relations Commission (dated January 1962)
157. City of Springfield, Human Relations Commission, Annual Report for 1962
158. City of Springfield, The Office of Intergroup Relations, Annual Report for 1963
159. The Office of Intergroup Relations, Springfield, Massachusetts, Semi-Annual Report, January 1, - June 30, 1964
160. The Office of Intergroup Relations, Springfield, Massachusetts, Annual Report, 1965
161. Human Relations Commission, Springfield, Massachusetts, Annual Report, 1966
162. Human Relations Commission, Springfield, Massachusetts, Annual Report, 1967
163. Human Relations Commission, Springfield, Massachusetts, Annual Report, 1968
164. Human Relations Commission, Springfield, Massachusetts, Annual Report, 1969
165. Human Relations Commission, Springfield, Massachusetts, Annual Report, 1970
166. Human Relations Commission, Springfield, Massachusetts, Annual Report, 1971
167. Human Relations Commission, Springfield, Massachusetts, Annual Report, 1972
168. Human Relations Commission, Springfield, Massachusetts, Annual Report, 1973

**MISCELLANEOUS**

169. Proposal Arise for Social Justice -- Request for \$50,000 to educate low-income people on entitlement programs 2002 May 24
170. Political Flyer FOCUS (A Black Alliance) Supports Ryan for Mayor (undated)
171. Campaign Finance Report 12/31/2005, Municipal Form Orlando Santiago
172. Summary Report of Campaign Receipts and Expenditures Committee to Elect Carol Lewis-Caulton 10/31/2001
173. US District Court Consent Decree 12/12/1994 Castro et al v Beecher et al
174. City Council Salaries and the Competitiveness of Elections: A Survey Worcester Regional Research Bureau 09/22/2005
175. "Enhancing' Factors in At-Large Plurality and Majority Systems: A Reconsideration", Richard Engstrom and Michael McDonald Electoral Studies, 12:4, 385-401 (1993)
176. Copies of sample ballots in Spanish from the 2005 municipal election, provided by Rafael Nazario, 2005 candidate for City Council
177. Spanish surname analysis of turnout for the 1999, 2001, and 2003 elections conducted by Plaintiffs with letter dated July 25, 2006 to Deanne Bogan Ross from Anna-Marie Tabor, Goodwin Proctor
178. Spanish surname analysis of July 2006 registration conducted by the Department of Justice, Civil Rights Division, Voting Section, with letter dated September 28, 2006 to Edward M. Pikula from John "Bert" Russ, Veronica S. Jung, Attorneys, Voting Section
179. 1990 Census data for Hampden County precincts provided by Election Data Services, Inc., 1225 I Street NW, Suite 700, Washington, D.C., entitled State of Massachusetts LED Review Commission
180. Copies of the pleadings in Commonwealth of Massachusetts, et al. v. United States of America, C.A. No. 83-0945, produced by Paul A Lazour, who was the attorney of record for the Massachusetts Attorney General in the case, with letter dated October 26, 2006 to Deanne E.B. Ross from Paul A Lazour
181. Chart A & Chart A-1 -- November 1991 and November 1993 Springfield City Council election tabulations

182. Chart B & Chat B-I -- November 1995 and November 1997 Springfield City Council election tabulations
183. Chart C -- November 1999 Springfield City Council election tabulations
184. Chart D -- November 2001 Springfield City Council election tabulations
185. Chart E -- November 2003 Springfield City Council election tabulations
186. Chart F -- November 2005 Springfield City Council election tabulations
187. Chart G -- Springfield School Committee election tabulations for November 1991; 1993; 1995; 1997; 1999; and 2001
188. Chart H -- November 2003 Springfield School Committee election tabulations
189. Chart I -- November 2005 Springfield School Committee election tabulations
190. Chart L -- Election tabulations for referendum questions on the November ballots for 1959; 1963; 1977; 1987; and 1997
191. Chart R -- November 1981 Springfield School Committee election tabulations
192. Chart S --Election tabulations for former Springfield School Committee member Robert McCollum for the November election in 1989; 1991; 1995; 1999 and 2003
193. Chart T -- Election tabulations for former Springfield School Committee member Carmen Rosa for the November 1993 election

**MAPS & REDISTRICTING PLANS**

194. Various maps and redistricting plans created by MassGIS, Daniel Marrier, GIS Systems Analyst (made available at his October 31, 2006 deposition or subsequent to his deposition)
- A. Demographic map of Springfield, with precinct and ward boundaries; African American voting age population
  - B. Demographic map of Springfield, with precinct and ward boundaries; Hispanic voting age population
  - C. Map of Springfield, neighborhoods
  - D. Plaintiffs' nine single-member district plans, with residence of incumbents, former incumbents, candidates, and named Plaintiffs, plus demographic data of plans
  - E. Plaintiffs' six single-member district plans
  - F. Two-plan overview: Plaintiffs' nine single-member district plan and precinct boundaries; plus identification of the precincts that are split
  - G. Two plan overview: Plaintiffs' nine single-member district plan and ward boundaries
  - H. Two plan overview: Plaintiffs' nine single-member district plan and neighborhood boundaries; plus identification of neighborhoods split
  - I. Two-plan overview: Plaintiffs' six single-member district plan and precinct boundaries; plus identification of the precincts that are split
  - J. Two plan overview: Plaintiffs' six single-member district plan and ward boundaries
  - K. Two plan overview: Plaintiffs' six single-member district plan and neighborhood boundaries; plus identification of neighborhoods that are split
  - L. Partial thirteen single-member district plan, with minority-majority districts boundaries, plus demographics of minority-majority districts
  - M. Nine single-member district plan that splits one precinct; plus demographic data of plans
  - N. Nine single-member district plan with one two member majority African American district and one two-member majority Hispanic district

O. Two plan overview: Plaintiffs' six single-member district plan and plaintiffs' nine single member plan

195. 2000 Census Data – PL 94-171: Prepared by Massachusetts Voter Education Project United States Census data for the City of Springfield for 2000.
196. Engstrom, Richard L., Stanley A. Halpin, Jr., Jean A. Hill, and Victoria M. Caridas-Butterworth, "Louisiana," Quite Revolution in the South, The Impact of the Voting Rights Act 1965-1990, Chandler Davidson and Bernard Grofman, ed., Princeton University Press, (1994), 103-135.
197. Bullock III, Charles S., "Turnout in Municipal Elections," Policy Review, Spring 1990, Vol. 9, No. 3, pp. 539-549.
198. "Ward-based council is issue anew", Union-News, February 19, 2002, Peter Goonan
199. Grofman, Bernard; Lisa Handley and Richard G. Niemi, Minority Representation and the Quest for Voting Equality (Cambridge University Press, 1992), 104.
200. American Community Survey data for 2005 for the City of Springfield, <http://factfinder.census.gov/home/staff/man.html>
201. Springfield City Council vote of October 2, 2006, on "An Act Providing for the Election of city Councilors and School Committee persons within the City of Springfield" and a draft of the Act.
202. Names of persons casting provisional ballots in the 2006 primary and general elections
203. Declarants for the United States in the United States v. City of Springfield voting history as compiled by Ms. Gladys Oyola, Spanish Language Program Coordinator for the City of Springfield
204. Declarant for the United States in the United States v. City of Springfield interview notes as compiled by Ms. Gladys Oyola, Spanish Language Program Coordinator for the City of Springfield